



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit Amendment

Facility Name: Conner Holdings, LLC
Facility Address: 4153 Bypass Rd
Homerville, Georgia 31634, Clinch County
Mailing Address: P.O. Box 208
Homerville, GA 31634
Parent/Holding Company: Conner Holdings, LLC
Facility AIRS Number: 04-13-065-00016

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued an amendment to the Part 70 Operating Permit for:

Removal of all permit requirements for Sawmill Cyclone 1 (SCY1).

This Permit Amendment is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Amendment and Permit No. 2421-065-0016-V-02-0. Unless modified or revoked, this Amendment expires simultaneously with Permit No. **2421-065-0016-V-02-0**. This Amendment may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above; or for any misrepresentation made in App No. **TV-704618** dated October 31, 2022; any other applications upon which this Amendment or Permit No. **2421-065-0016-V-02-0** are based; supporting data entered therein or attached thereto; or any subsequent submittal or supporting data; or for any alterations affecting the emissions from this source.

This Amendment is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached 4 pages.



DRAFT

Richard E. Dunn, Director
Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION**1.3 Process Description of Modification**

This permit application proposes that Sawmill Cyclone SCY1 should not be permitted as a mandatory control device for Sawmill Chipper SCH1. SCH1 is only subject to the GA Rule (b) visible emission limit and GA Rule (e) PM emission limit, and is able to comply without using the sawmill cyclone. SCY1 is used to collect the wood chips and sawdust from SCH1 and deliver them to the sawmill screener (ID No. SSC1). The potential particulate matter (PM) emissions from SCH1 were calculated without considering the control efficiency of SCY1; and Conner Holdings, LLC (hereinafter “facility”) is still a minor source for PM under Title V of 1990 CAAA.

The facility requested that the differential pressure monitoring requirements for SCY1 should be removed; and the weekly operation and maintenance checks for SCY1 should be removed.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1.1 Updated Emission Units

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
DB01	The debarker removes bark from pine logs	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
SM01	The sawmill cuts debarked pine logs into rough-sawn lumber	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
DK01	Dry Kiln 1, continuous dry kiln with 100 MMBF/yr lumber drying capacity and 40 MMBtu/hr burner	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)	n/a	n/a
PM01	The planer mill cuts kiln-dried lumber into dimensional lumber	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
BP01	Bag plant for screening and bagging bark	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
SCH1	SCH1 processes wood scrap from the sawmill into wood chips and sawdust.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	SCY1	Cyclone
SCH2	SCH2 processes wood scrap from the sawmill into wood chips and sawdust.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
SSC1	SSC1 separates wood chips and sawdust from the sawmill, SCH1, and SCH2.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
PCH1	PCH1 processes wood scrap from the planer mill into shavings.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	PCY1	Cyclone

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating LimitModified Condition:

- 3.5.1 The Permittee shall operate the cyclone (ID No. PCY1) at all times that the associated emission unit is being operated.
[391-3-1-.02(2)(a)10]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.2 Specific Monitoring Requirements

Modified Conditions:

5.2.1 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. A differential pressure indicator on the cyclone (ID No. PCY1) that controls Planer Mill Chipper 1 (ID No. PCH1) for measuring the differential pressure across the cyclone. Data shall be recorded on each shift or portion of each shift that PCH1 is operated. If PCH1 does not operate during a shift, the record shall note such.

5.2.2 The Permittee shall perform the following operation and maintenance checks and retain a record suitable for inspection or submittal for each week or portion of each week of operation of Planer Mill Chipper 1 (ID No. PCH1) that is controlled by the cyclone (ID No. PCY1). A check list or other similar log may be used for this purpose:

[391-3-1-.02(6)(b)1.]

- a. Check exterior of the cyclone for holes in the body or evidence of malfunction in interior of the cyclone.
- b. Check hopper for bridging and plugging.
- c. Check particulate transfer device for proper operation to ensure duct removal.

Any adverse condition discovered by this inspection shall be corrected in the most expedient manner possible. The Permittee shall record the incident as an excursion and note the corrective action taken.

PART 6.0 OTHER RECORD KEEPING AND REPORTING REQUIREMENTS**6.1 General Record Keeping and Reporting Requirements**Modified Condition:

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)]

- a. Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)

None required to be reported in accordance with Condition 6.1.4.

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)

- i. Any twelve consecutive month period for which the total amount of wood products processed by Dry Kiln 1 (ID No. DK01), as determined in accordance with Conditions 6.2.3 and 6.2.4, exceeds 100 MMbf.

- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)

- i. Any time the pressure drop recorded in accordance with Condition 5.2.1 is outside the cyclone manufacturer recommended pressure drop range.

- ii. Any failure to carry out an inspection required by Condition 5.2.2.

- iii. Any adverse condition(s) discovered by weekly inspections of the cyclone (ID No. PCY1) required by Condition 5.2.2, which is not corrected within 24 hours of discovery.

- iv. Any time Dry Kiln DK01's power vents are not operated when DK01 is in operation.

